DOCUMENT RESUME

ED 441 921 UD 033 594

TITLE	New York State Education Department and New York City Board of Education: Monitoring Improvement Efforts of Schools with Low Standardized Test Scores.
INSTITUTION	New York State Office of the Comptroller, Albany. Div. of Management Audit.
REPORT NO	SNY-OSC-98-S-34
PUB DATE	2000-05-10
NOTE	29p.
AVAILABLE FROM	For full text: http://www.osc.state.ny.us.
PUB TYPE	Reports - Evaluative (142)
EDRS PRICE	MF01/PC02 Plus Postage.
DESCRIPTORS	*Educational Improvement; Elementary Secondary Education; *Low Achievement; *Program Effectiveness; Program Evaluation; *Urban Schools
IDENTIFIERS	*New York City Board of Education; New York State Education Department

ABSTRACT

Between 1990 and 1997, 159 schools in New York were classified as Schools under Registration Review (SURR), but by 1997 54 of these schools had improved enough to no longer be classified as SURR. Seven of the schools had reorganized or closed, and 98, 94 of which were in New York City, were still classified as SURR. An audit was conducted to determine whether the New York State Education Department and the New York City Board of Education had monitored the improvement efforts of these schools adequately. The audit included the examination of evidence recorded in accounting and operating records and the assessment of estimates, judgments, and decisions made by school management. Findings indicate that the Board and the Department did not always perform adequate analyses to determine the effectiveness of various consultant programs used by schools to improve performance on standardized tests. Improvement programs were not always effective, and some schools were able to improve their performance without the help of these costly programs. After completion of the audit, the New York Department of Education announced plans for a new information system to identify and track the academic performance of each student in the state. This report recommends that such a system contain the ability to correlate academic performance with improvement programs and resource allocations. Appendixes contain a list of major contributors to the report, the comments of state education department officials, and comments of officials from the New York City Board of Education. (SLD)

Reproductions supplied by EDRS are the best that can be made
from the original document.

ED 441 921

State of New York
Office of the State Comptroller
Division of Management Audit
and State Financial Services

NEW YORK STATE EDUCATION DEPARTMENT AND NEW YORK CITY BOARD OF EDUCATION

MONITORING PERFORMANCE AUDITS OF SCHOOL DISTRICTS AND BOCES

BEST COPY AVAILABLE

UD033594

U.S. DEPARTMENT OF EDUCATION
Office of Educational Research and Improvement
EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)
This document has been reproduced as received from the person or organization originating it.
Minor changes have been made to improve reproduction quality.
Points of view or opinions stated in this document do not necessarily represent official OERI position or policy.

2

PERMISSION TO REPRODUCE AND DISSEMINATE THIS MATERIAL HAS BEEN GRANTED BY
R M Malan
N.Y State Office of the Comptroller
TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)

1

State of New York
Office of the State Comptroller

Division of Management Audit and
State Financial Services

Report 98-S-34

Mr. Carl T. Hayden
Chancellor
The University of the State of New York
Education Building
Albany, NY 12234

Mr. Harold O. Levy
Interim Chancellor
New York City Board of Education
110 Livingston Street
Brooklyn, NY 11201

Dear Mr. Hayden and Mr. Levy:

The following is our report addressing the actions taken by the State Education Department and the New York City Board of Education in monitoring improvement efforts of schools with low standardized test scores.

This audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution; Article II, Section 8 of the State Finance Law; and Article III, Sections 33 of the General Municipal Law. Major contributors to this report are listed in Appendix A.

Office of the State Comptroller
Division of Management Audit
and State Financial Services

May 10, 2000

OSC Management Audit reports can be accessed via the OSC Web Page : **http://www.osc.state.ny.us**.
If you wish your name to be deleted from our mailing list or if your address has changed, contact the Management Audit Group at (518) 474-3271 or at the Office of the State Comptroller, Alfred E. Smith State Office Building, 13th Floor, Albany, NY 12236.

Executive Summary

New York State Education Department and New York City Board of Education Monitoring Improvement Efforts of Schools with Low Standardized Test Scores

Scope of Audit

Elementary and secondary schools in New York State are administered by more than 700 local school boards. In New York City, the schools are administered by the New York City Board of Education (Board). Local school boards are overseen by the State Education Department (Department), which is guided by the Board of Regents. Students in certain grades are required by the Board of Regents to take standardized tests to measure their competence in reading, writing and math. If a certain percentage of a school's students (90 percent at the time of our audit) do not score high enough on a test to demonstrate a minimum level of competence in that skill, the school's performance on that test is considered to be below the State standard. The lowest performing of these schools may be classified by the Department as Schools Under Registration Review (SURR), and if their performance does not improve on subsequent tests, they may be required by the Department to close.

During the 1996-97 school year, 1,521 of New York's 4,111 schools experienced overall student test results that were below the State standard for one or more test. Between 1990 and 1997, a total of 159 schools were classified as SURR. As of December 1997, 54 of these schools had improved enough to no longer be classified as SURR, 7 schools had reorganized or closed, and 98 schools were still classified as SURR. Of these 98 schools, 94 were located in New York City. Our audit addressed the following question about the improvement efforts at SURR schools and other schools performing below the State standard during the period July 1, 1995 through November 30, 1998:

- Did the Department and the Board adequately monitor these improvement efforts?

Audit Observations and Conclusions

In recent years the Department and the Board have emphasized accountability for school performance. This emphasis as well as the commitment to monitor and to recommend operational improvements to schools with academic performance which is below State standards is necessary and commendable. However, it is also critically important for the Department to be able to adequately determine which resource allocations and which program initiatives work most effectively and which work less effectively

at improving student academic performance in given school settings. With this type of performance measurement capability, the Department and the districts can share information and can make informed decisions which are most likely to maximize resource investment and produce desired academic performance outcomes.

We found that the Board and the Department did not always perform adequate analysis to determine the effectiveness of various consultant programs being used by schools to improve performance on State standardized tests. We found that the improvement programs were not always effective and some schools were able to improve their performance without the help of these costly programs. Subsequent to the completion of our audit field work, Department officials advised of their plans to design a new information system that would identify and track the academic performance of each student on a statewide basis. We believe that it is important that such a system should be designed with functionality to correlate academic performance with improvement programs and resource allocations. (See pp. 5-9)

We also concluded that the Department should monitor the performance trends at below-standard schools, determine which schools improved, identify reasons for improvement, and recommend that effective practices be adopted at other schools. (See pp. 11-12)

The Department generally receives no State Aid appropriations which are specifically assignable to schools based upon academic performance that is below State standards. However, for the 1996-97 and 1997-98 school years, the Department reports that about $9 million of federal Title I Improvement Program funds and School Effectiveness Program funds were allocated to numerous projects that generally seek to improve performance of SURR schools and schools performing below State standard. While the Department had expenditure plans and various reports and analysis that recapped the completion and the accomplishment of certain of these projects, the Department did not maintain analysis showing how the various projects either individually or collectively directly affected the performance outcomes of students. While we recognize that such measurement is challenging and requires resources to implement, we maintain that such measurement is necessary to permit assessment of the relative effectiveness of various options. (See pp. 8-9)

Comments of Department and board Officials

Department officials generally agree with most of the recommendations in our report. Board officials do not specifically agree or disagree with the two recommendations in our report that pertain to the Board. Board officials believe that the audit does not fully appreciate the complexities of determining increases in students' test scores.

Contents

Introduction	Background	1
	Audit Scope, Objective and Methodology	3
	Response of Department and Board Officials to Audit	3
Monitoring Resource Allocations and Improvement Programs	Improvement Programs	5
	Resource Allocations	8
	Recommendations	9
Monitoring Below-Standard Schools		11
	Recommendation	12
Classifying Schools as SURR		13
	Recommendations	14
Appendix A	Major Contributors to This Report	
Appendix B	Comments of State Education Department Officials	
Appendix C	Comments of New York City Board of Education Officials	

Introduction

Background

The Board of Regents (Regents) is responsible for setting education policies and for guiding, managing and monitoring the education system in New York State, which has the second largest elementary and secondary school system in the nation. In fulfilling these responsibilities, the Regents work with the Governor and Legislature, who also initiate education programs and ultimately control the State funds devoted to education. The 16 Regents, who are elected to five-year terms by the Legislature, are headed by a Chancellor.

The Regents are served by the State Education Department (Department), which administers the State's education policies and programs. The Department oversees local school boards and monitors compliance with education laws and regulations. In addition, it offers technical assistance to the teachers and administrators at local schools. The Department employs about 3,300 staff, who are headed by a Commissioner who is appointed by the Regents. About 600 of the Department's staff are involved in reviewing elementary and secondary education practices.

While the Regents are responsible for setting education policy, the State education system is primarily a decentralized operation, rooted in the concept of local autonomy. Local school boards in about 700 school districts across the State make daily operating decisions for 4,111 individual schools. Reflecting this decentralization, the Department's 1998-99 annual budget included about $295 million for State operations and more than $15 billion in State aid to localities. Some of this aid is distributed on the basis of a general formula that takes into account factors such as the student population in each school district. The remainder of the State aid is distributed to eligible school districts in accordance with specific education programs, including programs that provide remedial services and discourage students from leaving school prematurely.

All public schools in New York City are overseen by the New York City Board of Education (Board). The Board employs more than 116,000 staff, including teachers, administrators, social workers, counselors and paraprofessionals to operate its 1,115 schools. While the high schools are managed directly by the Board, the elementary and intermediate schools are managed by 32 separate Community School Districts (CSD). The Board is supervised by the Regents, but various sections of the State Education Law assign many responsibilities specifically to the Board.

The Regents require that all students take certain standardized tests to measure their basic skills. For example, prior to the 1998-99 school year, students in the fifth grade were required to take Pupil Evaluation Program (PEP) exams in reading, writing and math. (Starting in the 1998-99 school year, the PEP exams were replaced by more stringent exams correlating to the new learning standards, and given in the fourth and eighth grades.) In addition, in the eighth or ninth grade, students are required to take Preliminary Competency Tests (PCT) in reading and writing. If a student does not attain a certain score (called the State Reference Point) on a test, the student is determined to be making unsatisfactory progress in developing the basic skill measured by that test and is given remedial assistance in that subject area. Therefore, each test is intended to determine whether students have attained a minimum competence in a basic skill.

Each year, the Department analyzes how the students at each school in the State performed on certain of these tests. If a certain percentage of a school's students (90 percent at the time of our audit) do not score high enough on a test to demonstrate minimum competence in that skill, the school's performance on that test is considered to be below the State standard. During the 1996-97 school year (the most recent school year for which data was available at the time of our audit), 1,521 of the 4,111 schools in the State performed below the State standard on a test.

The schools with low performance on a standardized test and having been identified as most in need of improvement may be classified by the Department as Schools Under Registration Review (SURR). Each SURR school is visited regularly and monitored by Department staff, who review the school's operations and recommend operational improvements. If a SURR school does not improve its performance on the standardized test, its registration can be revoked by the Department. Since schools are not allowed to operate in New York State unless they are registered with the Department, such a school will be forced to close. SURR classifications are made by the Department, which is required by State regulation to consider the circumstances of each low performing school and classify as SURR only those schools that are most in need of improvement. Therefore, depending on the Commissioner's evaluation, some of the lowest performing schools may not be classified as SURR.

Between the 1989-90 school year (when SURR classifications began) and the 1997-98 school year, a total of 159 schools were classified as SURR. By December 1997, 54 of these schools had improved enough to no longer be classified as SURR, seven schools had reorganized or closed, and 98 schools were still classified as SURR. These 98 schools included 59

elementary schools, 27 intermediary schools and 12 high schools; 94 of the 98 schools were located in New York City.

Audit Scope, Objective and Methodology

We audited the actions taken by the Department and the Board in monitoring the improvement efforts of SURR schools and other schools performing below the State standard during the period July 1, 1995 through November 30, 1998. The objective of our performance audit was to evaluate the adequacy of these monitoring efforts. To accomplish our objective, we reviewed and analyzed relevant Department and Board records, and we interviewed appropriate Department and Board managers and staff. We also interviewed educators at New York University and officials at the Educational Priorities Panel, a not-for-profit organization.

We conducted our audit according to generally accepted government auditing standards. Such standards require that we plan and do our audit to adequately assess those procedures and operations included within the audit scope. Further, these standards require that we understand the Department's and the Board's internal control systems and their compliance with those laws, rules and regulations that are relevant to the operations included in our audit scope. An audit includes examining, on a test basis, evidence supporting transactions recorded in the accounting and operating records and applying such other auditing procedures as we consider necessary in the circumstances. An audit also includes assessing the estimates, judgments, and decisions made by management. We believe our audit provides a reasonable basis for our findings, conclusions and recommendations.

We use a risk-based approach when selecting activities to be audited. This approach focuses our audit efforts on those operations identified through our preliminary survey as having the greatest probability for needing improvement. Consequently, by design, we use our finite audit resources to identify where and how improvements can be made. Thus, we devote little audit effort to reviewing operations that may be relatively efficient or effective. As a result, our audit reports are prepared on an "exception basis." This report, therefore, highlights those areas needing improvement and does not address activities that may be functioning properly.

Response of Department and Board Officials to Audit

A draft copy of this report was provided to Department and Board officials for their review and comment. The comments of the Department and the Board were considered in preparing this report and are included as Appendix B and Appendix C, respectively.

Within 90 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of the State Education Department shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons therefor. We also request that such a report be made by the Chancellor of the New York City Board of Education.

Monitoring Resource Allocations and Improvement Programs

In recent years the Department and the Board have emphasized accountability for school performance. This emphasis as well as the commitment to monitor and to recommend operational improvements to schools performing below State standards is necessary and commendable. However, it is also critically important that the Department can adequately determine which resource allocations and which program initiatives work most effectively and which work less effectively at improving student academic performance in given school settings. With this type of performance measurement capability, the Department and the districts can share information and can make informed decisions which are most likely to maximize resource investment and produce desired academic performance outcomes. The following sections of this report discuss areas where such performance measurement capability can be applied.

Improvement Programs

We reviewed Department and Board procedures regarding their evaluation of the effectiveness of the different programs designed to improve students' performance on the standardized tests. Board officials told us that several of the improvement programs used in New York City schools have been evaluated by consultants that were hired by the Board. We reviewed some of the reports prepared by these consultants and conclude that they are not adequate for evaluating the effectiveness of the improvement programs in City schools, because they generally are not based on systematic analysis to determine whether test scores improved at the schools using the programs. Moreover, in some instances, the effectiveness of a program was evaluated by the same consultant that developed the program. Such an evaluation may not be as reliable as an evaluation performed by an independent party. For example, the evaluations that the Board arranged for revealed:

- Johns Hopkins University was contracted to review the implementation of the Success For All program, which is used at a number of City schools. However, the University's report only addressed a portion of these schools and did not include an analysis of the schools' performance on the State standardized tests.

- Metis Associates, Inc. was contracted to assess the implementation of the Success For All program at six elementary schools. However, the consultant did not determine whether the program

was successful at improving test scores. Rather, the consultant assessed the process of program implementation.

- Two other programs were evaluated by two other consultants (Lightspan Partnership and the McKenzie Group, Inc.). However, neither consultant analyzed the schools' performance on the State standardized tests, and one consultant (the McKenzie Group) focused on whether program participants liked the program, not whether the program was effective.

- Two consultants (Johns Hopkins University and Lightspan Partnership) evaluated programs that they had developed.

Department officials told us they have reviewed some of the improvement programs used by SURR schools, but they have not reviewed all of these programs nor have they tracked the performance of all participating schools. The officials also told us that they have focused their efforts on systematic evaluations of the SURR program as a whole rather than on evaluations of individual improvement programs. For example, the Department produced an annual report about the SURR program, hired New York University to perform an external evaluation of the SURR program, and asked schools to assess the Department's registration review visits. We acknowledge the value of the Department's efforts to evaluate the overall effectiveness of the SURR program. However, if the Department does not also evaluate the effectiveness of individual improvement programs, it may encourage schools to use, and provide funding for, programs that are not effective.

Many of the SURR schools in New York City participated in the Models of Excellence program, which offered several different approaches to improving the performance of students and included a number of individual improvement programs such as the Success For All program. To determine whether the Models of Excellence program was effective, we reviewed the 1997 scores on the State standardized tests for third and sixth grade reading and math at 52 of the 79 New York City SURR schools that were participating in the program during the 1996-97 school year. We selected these 52 elementary and intermediary schools because they had participated in the program since 1993.

We found that none of the schools with third grade test results performed at the State standard on the third grade reading test, none of the schools with sixth grade test results performed at the State standard on the sixth grade reading test, only 36 percent of the schools with third grade test results (17 of 47) performed at the State standard on the third grade math

test, and only 30 percent of the schools with sixth grade test results (8 of 27) performed at the State standard on the sixth grade math test. Five schools did not have third grade test results and 25 schools did not have sixth grade test results because some of the schools did not include a third grade, many of the schools did not include a sixth grade, and a few schools did not have complete data for their test results.

Therefore, most of the 52 schools performed below the State standard on these tests. However, it should also be noted that most of these schools improved their performance in 1997. Specifically, for 77 percent of the tests on which a school performed below the State standard in 1997, the school's performance in 1997 was better than its performance in 1995. However, since the Department has not developed specific criteria for evaluating program effectiveness, we cannot conclusively evaluate the effectiveness of the program. We note that an earlier Department study of this program also identified conflicting indicators of program effectiveness, as the study found that most of the SURR schools participating in the program did not improve enough to be removed from the SURR list, but the percentage of participating schools that were removed from the SURR list was higher than the percentage of non-participating schools that were removed from the SURR list.

(In response to our draft report, Department officials stated that the Model of Excellence program has been replaced by the Federal Comprehensive School Reform Demonstration Program, which is based on a similar concept of providing schools with the opportunity to replicate nationally recognized, research-based school improvement programs. The Department believes that inherent in this program are many of the evaluation components recommended by the audit.)

To further evaluate the effectiveness of school improvement programs, we judgmentally selected six below-standard schools in New York City and five below-standard schools outside New York City at which sixth grade reading scores improved by at least 20 percent between 1995 and 1997. We asked officials at each of these schools whether their improvement could be attributed to any particular program. We found that three of the City schools and two of the non-City schools used improvement programs, while the other three City schools and the other two non-City schools did not use improvement programs. Moreover, we were consistently told that the improvement in reading was the result of the staff's extra effort rather than any special program. Therefore, some schools may be able to improve their performance without the help of costly prepackaged improvement programs.

The Department and the Board must work together to determine which approach is best for each school, and if a prepackaged program is the best approach for a particular school, the Department and the Board need to be able to help that school select the program that is best suited for that school. If the Department and the Board are to be able to provide such guidance, they must evaluate the effectiveness of the available programs.

Board officials responded that it is difficult to isolate the effect of a single program from the effects of other programs in a school. We acknowledge the difficulty of this task. However, unless individual improvement programs are evaluated and the more effective programs identified, school officials may not have a reliable basis for selecting an approach to helping their students become competent in basic skills.

(Subsequent to the completion of field work for our audit, Department officials advised us of their plans to implement a new statewide student information system which would be the foundation for tracking and measuring the academic performance of the State's schools districts and students. We believe that the planning for this system should also include the capability to correlate resource allocations and improvement programs to actual academic outcomes. It would also appear that this system would not only facilitate efforts at improving results of schools below State standards, but would also help to further improve the results of schools performing at or above State standards.)

Resource Allocations

The Department generally receives no State Aid appropriations which are specifically assignable to schools based upon academic performance that is below State standards. The Department did, however, administer one legislative member item of $2 million for the 1997-98 year that was appropriated to fund initiatives intended to help improve SURR school performance. In addition, the Department does annually administer the Federal Title I Improvement Program and the State School Effectiveness Program which are targeted to economically disadvantaged districts and are also intended to improve educational quality and student academic performance. For the 1996-97 through 1997-98 school years, the Department reports that about $9 million of funds for these two programs have been used for numerous projects that generally seek to improve performance of SURR schools and schools performing below State standard. The Department maintained records supporting the planning for the uses of these funds and we were able to trace the use of these funds to specific expenditures and related projects. In addition, the Department provided various reports and analysis that recapped the completion and accomplishment of certain of the projects. However, the Department did not maintain measurements of how the various projects either individually

or collectively affected the performance outcomes of the students in SURR schools or other schools performing below State standard. We recognize, as the Department pointed out to us, that constructing such a metric would be very challenging and would require reallocation of scarce resources. Nevertheless, as previously discussed, if the Department is to facilitate overall improvements in student and school academic performance, it is critically important that the Department is able to assess the relative effectiveness of its investments of resource allocations. If justifiable resource limitations hinder this assessment, the Department can bring further attention to this through the State budget process.

Recommendations

To the Department:

1. Develop the capability to adequately determine which resource allocations and which program initiatives work most effectively and which work less effectively at improving academic performance in given school settings.

   (Department officials agree with recommendation number 1. They indicate that they are in the process of identifying an organization that will review the process of allocating resources and their impact on improvement of academic performance in a given school setting.)

To the Department and the Board:

2. Ensure that all school improvement programs are evaluated independently to determine the extent to which they are effective at improving student scores on State standardized tests.

3. Determine why some school improvement programs are more effective than others, and determine whether certain types of programs are likely to be more effective in certain circumstances.

Recommendations (Cont.'d)

(Concerning recommendation number 2, Department officials agree with the notion that consultant programs should be evaluated for effectiveness. However, officials state that the Department should not favor or appear to favor any fee based programs available to schools and districts monitored by the State. They also state that the role of the Department should be to assist districts and schools in making good choices. Department officials agree with recommendation number 3. They add that an evaluation is in process for the Comprehensive School Reform Demonstration program.)

(Board officials do not specifically agree or disagree either with recommendation number 2 or recommendation number 3. They state that we have not fully appreciated the complexities of determining increases in students' test scores and, therefore, are attempting to reduce multi-variable relationships to a single causal explanation. They add that program results are apparent over time and care must be exercised to prevent premature judgement.)

Auditors' Comments: We do not dispute that the Department may be able accomplish the intent of recommendation number 2 through effective guidance to districts and schools. With respect to Board comments, we reiterate that our report already acknowledges that it is difficult to isolate the effects of a single program from the effects of other programs in a school. However, we believe the Board must respond to this challenge so that those programs that truly have benefit in terms of increasing student performance can be recognized and promoted. In this regard, the guidance being contemplated by the Department may also be of use to the Board.

Monitoring Below-Standard Schools

As is shown in the following table, as of December 1997, a total of 1,521 schools were performing below the State standard and 98 of these schools were classified as SURR:

Location	SURR	Below Standard
New York City	94	894
Buffalo, Rochester, Syracuse or Yonkers	1	151
Small cities	0	45
Suburban areas	1	41
Rural areas	2	390
Totals	98	1,521

Therefore, significant improvements are needed in student performance at these schools. However, while SURR schools receive extra attention from the Department to help them improve their performance, the remaining below-standard schools do not receive this same attention. Moreover, if the performance of the students at these below-standard schools does not improve, the schools may be reclassified as SURR. For example, in November 1997, 20 below-standard schools in New York City were reclassified as SURR, while 18 New York City schools were removed from the SURR list.

We believe more of an effort should be made to improve the performance of students at the below-standard schools not classified as SURR in order to prevent them from becoming SURR. In particular, the Department could monitor performance trends at below-standard schools, determine which schools were improving, identify the reasons for the improvement, and recommend that the effective practices be adopted at other schools.

Department officials responded that, if they were to commit additional resources to monitor below-standard schools, they would have to decrease the resources dedicated to SURR schools, and would consequently jeopardize their ability to improve the performance of SURR schools. We acknowledge the difficulties involved in monitoring additional schools. However, the Department is not limited to the resources dedicated to SURR schools, and evaluations may need to be made about whether resources can be shifted from other areas without affecting the SURR

program. We note that, unless student performance can be improved at the below-standard schools not classified as SURR, a significant number of students will continue to lack basic skills.

Recommendation

To the Department:

4. Monitor performance trends at below-standard schools, determine which schools are improving, identify the reasons for the improvement, and recommend that the effective practices be adopted at the below-standard schools where performance is not improving.

   (Department officials agree with recommendation number 4. They indicate that they have drafted regulatory amendments to identify schools performing below accountability criterion, to establish yearly progress targets for schools, to require improvement plans when adequate progress is not made, and to recognize schools making rapid improvements.)

Classifying Schools as SURR

The schools with the lowest performance on a standardized test may be classified by the Department as SURR, depending on the evaluation of the circumstances affecting each school's performance. If a school is classified as SURR, it receives additional assistance from the Department. The Department uses cutoff points to identify potential SURR schools. For example, in the 1995-96 school year, if fewer than 30 percent of a school's third grade students achieved the State Reference Point on the reading test, the school was considered for SURR classification. For the 1995-96 and 1996-97 school years, we reviewed the process used by the Department to identify potential SURR schools and found that certain improvements can be made in this process, as is shown by the following examples from a total of 135 different schools:

- A total of 25 low performing schools were not considered for SURR classification, even though their performance exceeded the Department's cutoff points, because the performance data submitted by the schools was considered inaccurate by the Department. Department officials told us they were informed by district officials that the data was inaccurate and, on the basis of previous submissions and discussions with district officials, Department officials accepted that the data was inaccurate and allowed revised data to be submitted. However, Department officials did not verify that the original data was in fact inaccurate. We believe the Department should verify the data in such instances. Department officials told us that, beginning with the 1997-98 school year, the district superintendent is required to certify that test data is correct before it is submitted to the Department and any revised data must be supported by appropriate documentation.

- A total of 84 low performing schools were not considered for SURR classification, even though their performance exceeded the Department's cutoff points, because they were alternative schools intended to educate at-risk students who transfer from traditional high schools. During the two years we examined, it was the Department's policy to exclude such schools from the SURR list. However, we believe such schools would benefit from the improvement efforts that are made at SURR schools. Beginning with the 1997-98 school year, the Department revised its policy and no longer automatically excludes alternative high schools from SURR classification.

- A total of 10 low performing schools were not considered for SURR classification, even though their performance exceeded the Department's cutoff points, because fewer than 20 students took the standardized test used in making the SURR classification. It is the Department's policy to exclude such schools from the SURR list because Department officials believe the results of such small samples are not reliable indications of overall student performance at a school. While we understand this policy, we would also suggest that an appropriate method should be developed for evaluating the performance of schools with small test populations.

Recommendations

To the Department:

5. Ensure that any revised performance data submitted by a school is either verified or appropriately documented.

6. Develop a method for evaluating the performance of schools with small test populations.

(Department officials agree with recommendation number 5 and with recommendation number 6. They state that, subsequent to the time period covered in our audit, the Department revised its process for data verification and conducted spot audits of data. Officials add that the Regents adopted amended regulations that put in place a method using data from multiple years to evaluate schools with small test populations.)

Major Contributors to This Report

Jerry Barber
Robert Lindholm
Michael Solomon
Tom Trypuc
Myron Goldmeer
Emma Wohlberg
Carole Siegall
Orin Ninvalle
Irina Herman
Tammy Dunn
Dana Newhouse

THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234

Chief Operating Officer
Tel. (518) 474-2547
Fax (518) 473-2827
E-mail: rcate@mail.nysed.gov

March 31, 2000

Mr. Jerry Barber
Audit Director
Office of the State Comptroller
A.E. Smith State Office Building
Albany, NY 12236

Dear Mr. Barber:

I am responding to the draft audit report (98-S-34) addressing the State Education Department's and the New York City Board of Education's monitoring of improvement efforts of schools with low standardized test scores.

Recommendation 1: Develop the capability to adequately determine which resource allocations and which program initiatives work most effectively and which work less effectively at improving academic performance in given school settings.

We agree with the recommendation. We are in the process of identifying an organization that will be assigned the task of reviewing:

- the process of allocating resources; and
- their impact on the improvement of academic performance in given school settings.

Recommendation 2: Ensure that all school improvement programs are evaluated independently to determine the extent to which they are effective at improving student scores on State standardized tests.

We agree partially with the recommendation. This question requires a two-part response. First, the New York State Education Department (NYSED) concurs with the notion that "consultant programs" should be evaluated for effectiveness. However, we do not believe it appropriate that NYSED favor or appear to favor any fee based program that is available to schools and districts monitored by the State. The decision to use or not use such programs must rest with the local education agency and school. Each local district in turn should evaluate how successful the replication of a particular program has been in the district.

The role of NYSED should be to assist districts and schools in making good choices. With this in mind, one of the NYSED collaborators in the Comprehensive School Reform Demonstration (CSRD) program initiative (Teacher Centers Consortium of the United Federation of Teachers) commissioned the LAB at Brown University to conduct a CSRD model alignment study. The purpose of this study is to determine the degree of match between each of several CSRD models being implemented in New York State and the New York State Learning Standards. A multi-chapter volume with related staff development materials will be ready for dissemination shortly.

Recommendation 3: Determine why some school improvement programs are more effective than others, and determine whether certain types of programs are likely to be more effective in certain circumstances.

We agree with the recommendation. In the case of districts and schools involved in the CSRD program, an evaluation is in process (see response to recommendation # 2 above). It is expected that the data derived will provide information concerning how the implementation of an externally developed model may impact a comprehensive school improvement program.

Recommendation 4: Monitor performance trends at below-standards schools, determine which schools are improving, identify the reasons for the improvement, and recommend that the effective practices be adopted at the below-standards schools where performance is not improving.

We agree with the recommendation. The Department has drafted amendments to Commissioner's Regulations that would: identify schools that are performing below a school accountability criterion, establish adequate yearly progress targets for such schools, and require schools to develop school improvement plans when adequate progress is not made. Regulations will also authorize the Commissioner to recognize schools that make rapid improvement. We are in the process of identifying an organization that will develop a process to identify the pattern(s) of practices used in schools that have been described as below standard but have shown significant improvement.

Recommendation 5: Ensure that any revised performance data submitted by a school is either verified or appropriately documented.

We agree with this recommendation. Subsequent to the time period covered by the audit, July 1, 1995 to November 30, 1998, the Department revised its process for verification of submitted data and conducted spot audits to verify data reported. The Department's planned implementation of a statewide student record system, as described in the audit, will contribute to the Department's ability to verify data.

Recommendation 6: Develop a method for evaluating the performance of schools with small test populations.

We agree with this recommendation. In October 1998, the Regents adopted amended Commissioner's Regulations that put in place a method using data from multiple years to evaluate schools with small test populations.

Other Comments:

Department staff has reviewed the audit report narrative and identified the following inaccuracies:

- Page 1, paragraph 1: Members of the Board of Regents are appointed to five-year terms, not seven-year terms as stated in the report.

- Page 2, paragraph 1: The PEP writing test was administered in Grade 5, not in Grades 3 and 6.

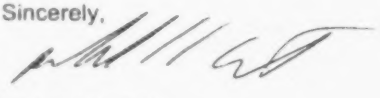
- The Department requests that the audit clarify that the Models of Excellence program referred to in the draft audit is no longer in existence. Many Schools Under Registration Review (SURR) now participate in the Comprehensive School Reform Demonstration Program (CSRD). CSRD makes funds available to encourage schools, especially Title I schools, to work towards comprehensive school reform by creating a comprehensive school reform program that includes a sound, research-based, established school reform model. The main objective of the program is to use these programs to enable all children to meet challenging statewide standards. SED believes that inherent in the CSRD model are many of the evaluation components recommended by the audit.

* Note 1

The Department further requests that the text more clearly identify those statements of fact that pertain to the New York City Board of Education and those that pertain to the State Education Department. For example the bullets on page 5 of the draft refer to evaluations done by the New York City Board of Education rather than the State Education Department. However, it is difficult to determine this fact from the text.

If you have any questions, please contact Shelia Evans-Tranumn or Ira Schwartz at (718) 722-2796.

Sincerely,



Richard H. Cate

cc: James A. Kadamus
Shelia Evans-Tranumn
Ira Schwartz

* State Comptroller's Note

1. Certain matters addressed in the draft report were revised or deleted in the final report. Therefore, some agency comments included in Appendix B may relate to matters no longer contained in this report.

BOARD OF EDUCATION OF THE CITY OF NEW YORK
HAROLD O. LEVY, *Chancellor*

OFFICE OF THE CHANCELLOR
110 LIVINGSTON STREET - BROOKLYN, NY 11201

April 3, 2000

Office of State Comptroller
APR 11 2000
RECEIVED
MAILROOM

Mr. Jerry Barber, Audit Director
Office of the State Comptroller
A. E. Smith Building
Swan Street
Albany, NY 12236

Re: Draft Audit Report on SED and BOE's Monitoring Improvement Efforts of Schools with Low Standardized Test Scores (98-8-S-34)

Dear Mr. Barber:

Enclosed are the Board of Education's responses to the draft audit report. We are pleased that the New York State Comptroller's office acknowledges the Board's emphasis on accountability for school performance.

Although only two of the six audit recommendations are addressed to the Board, we believe that the auditors have not fully appreciated the complexities of determining increases in students' test scores and, therefore, are attempting to reduce multi-variable relationships to a single causal explanation. Additionally, the results of program implementation are apparent over a period of time, and care must be exercised to prevent premature judgement.

As we did during the audit, we again share with you documents that will aid in understanding our approach.

The Board of Education always seeks improvement in student performance and continually reviews and assesses the effectiveness of programs.

Sincerely,

Judith Rizzo

Judith Rizzo, Ed.D
Deputy Chancellor for Instruction

JAR:bym
Enc.
C: William Casey
Betty D. Arce
Robert Tobias
Edward Torres

BEST COPY AVAILABLE

BOARD OF EDUCATION OF THE CITY OF NEW YORK
Harold O. Levy, *Chancellor*
10 LIVINGSTON STREET, BROOKLYN, NEW YORK 11201

March 13, 2000

MEMORANDUM

TO: MICHAEL KING

FROM: William P. Casey

SUBJECT: Response to NYSC's Audit of BOE and SED's Procedures for Low Performing Schools Program

Although most of the recommendations contained in the draft audit report are focused on the State Education Department, the allegations made relating to the Board's conduct appear to be as follows:

a. Analyses of intervention programs are not adequate to determine their effectiveness.
b. Some schools are able to improve their performance without costly programs.
c. Evaluation consultants focused on evaluation of program implementation rather than on the effect of the program on test scores.
d. In some instances, programs were evaluated by the same consultants that developed the program.

Reponses to the above concerns are:

a. Although it is tempting to suggest that increases in students' test scores can be traced to a single causal intervention, this is never the case. In a two-variable relationship, there is obvious cause and effect. However, educational innovations include several features, each of which becomes an intervening variable. As was indicated in a previous response, all educational innovations must be evaluated based on a number of factors, including, but not limited to: the size and scope of the innovation; the quality of administrative leadership; a school culture for change; teacher leadership and support for the innovation; and the quantity and quality of continuous professional development. Any one of these factors can and does impact on the ability of an educational innovation to raise student achievement.

b. It is true that some schools are able to improve student performance without the need to adopt "packaged" programs. They are able to succeed because they have developed their own school-based program that includes the research-based practices and procedures commonly found in many of the programs adopted by schools. The ability to accomplish this relies on many factors, including those mentioned above (i.e. supportive administrative leadership, teacher leadership and support, a school culture for continuous change, on-going professional development, and adequate resources). Also, since many of these factors rely on the ability of individuals to inspire, motivate, and persevere, they are clearly not able to be quantified.

c. Additionally, it may require a longer time to measure the effect of any one program on the achievement of the students. Educators have a history of making premature judgements about the effectiveness of educational innovations and discarding them before they have had an opportunity to demonstrate effectiveness. Analyses of educational programs require the examination of their implementation. In the initial stages of program implementation, it is important that the research-based practices, upon which the program was developed, are being executed in the way in which they were designed. A modification in any aspect of performance can dramatically effect the outcome of the entire program. Therefore, it is appropriate that a program evaluation should focus on the implementation of these practices to provide valuable assessment data for on-going program monitoring.

c. See attached response from Robert Tobias.

WPC:sk

c: Judith A. Rizzo
Betty Arce
Len L. Davis
Sandra Kase
Robert Tobias

BOARD OF EDUCATION OF THE CITY OF NEW YORK
HAROLD O. LEVY, Chancellor
DIVISION OF ASSESSMENT AND ACCOUNTABILITY • 110 LIVINGSTON STREET, ROOM 728, BROOKLYN, NY 11201

ROBERT TOBIAS
EXECUTIVE DIRECTOR
TELEPHONE (718) 935-3767
FAX (718) 935-5268

LORI MEI
DEPUTY EXECUTIVE DIRECTOR
TELEPHONE (718) 935-3777
FAX (718) 935-5268

MEMORANDUM

March 6, 2000

TO: MICHAEL KING

FROM: Robert Tobias

SUBJECT: Review of Draft State Comptroller's Audit Report 98-S-34 "*Monitoring Improvement Efforts of Schools with Low Standardized Test Scores*"

We have reviewed the draft copy of the State Comptroller's audit report *"Monitoring Improvement Efforts of Schools with Low Standardized Test Scores" (Report #98-S-34)*. Most of the audit's conclusions and recommendations are directed at the State Education Department and their oversight of programs put into place in Schools Under Registration Review (SURR) to improve students' academic performance.

Only two of the audit's recommendations are addressed to the Board (as well as to the State Education Department). These recommend that all school improvement programs be evaluated independently to ascertain their impact on students' performance on state tests, and that the relative effectiveness of different programs be determined. As noted in the report, it is difficult to isolate the effect of a single program from the effects of other programs in the school.

Further, while it is true that the designers of some of the models have conducted evaluations of their own programs, New York City has not used the data from these evaluations in either the selection of the models or in the evaluation of their efficacy. Within the constraints to definitive evaluation mentioned above, New York City has attempted to evaluate the efficacy of these programs, most notably in the attached internal report titled, "*Schools Under Registration Review/Models of Excellence 1994-95.*"

In addition and perhaps more fundamentally, several of the school improvement models examined in the audit are designed to change the culture of belief systems and practice in schools over time. In many of these models, improvement in student performance is a long-term objective that is believed to occur as a result of changes in culture and practice. This long-term change

model requires study over time, first to assess its qualitative impact on school culture and practice, and later its effect on student outcomes.

New York City has designed such a two-phase evaluative process. *The Performance Assessment in Schools Systemwide (PASS)* process qualitatively examines changes in school culture and practice by assessing schools against the standards and practice of exemplary schools. As indicated in the attached *PASS Review Guide*, schools are judged on 77 performance indicators relating to the essential elements of an exemplary school in terms of the extent to which they are *"Meeting Standards," "Approaching Standards,"* or are *"Below Standard"* on each element. In the second phase of this process, changes in student performance are examined using standardized test scores. Since most of the models of excellence have only recently been implemented, in many cases they have manifested their impact in PASS reviews, and are only beginning to show measurable gains on student outcomes.

RT/agh
Att.